



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Sent via email only

September 13, 2021

Richard Tremblay
Vice President Operations
Florence Copper, Inc.
1575 W. Hunt Highway
Florence, AZ 85132

**RE: Underground Injection Control (UIC) Permit Application No. R9UIC-AZ3-FY19-1
May 5, 2020 Southwest Value Partners Aquifer Exemption Petition
Florence Copper Project, Florence Arizona**

Dear Mr. Tremblay,

We are continuing to review the May 5, 2020 Petition to Revoke or Revise the Aquifer Exemption ("Petition") that was submitted by the Town of Florence and Southwest Value Partners. Florence Copper, Inc. (FCI) provided responses on March 8 and April 16, 2021 to EPA's February 10, 2021 request for information and on May 20, 2021 to EPA's May 14, 2021 request for information regarding the Petition.

The following requests additional clarification of technical information that will assist EPA in its review of the Petition. EPA appreciates Florence Copper's cooperation in providing the technical information requested below so that EPA may evaluate the Petition concurrent with our review of FCI's UIC permit application.

1. As described in FCI's May 20, 2021 response to request #3, please provide a contour map for Q4 2020 groundwater elevations similar to Figure 14A-10, Exhibit A-1, in the 2012 UIC application for the Production Test Facility.
2. Table A-3 in the 2019 groundwater modeling report of the UIC application listed the porosity of the oxide layers as a constant 8 percent while Table 1 in the March 2021 model results lists the oxide porosity as 5-8 percent.

Please clarify the inconsistent porosity of the oxide layers in the 2019 and 2021 modeling reports and provide the basis for the porosity values used in the 2021 modeling results.

3. Please clarify the illustration of particle tracking for 150 years in Figures 5 and 7 in FCI's May 20, 2021 response and whether results represent the influence of just the three closest Anthem wells or

all seven of the Anthem wells located within three miles of the AE boundary, or all wells pumping from the oxide and LBFU aquifers in the model domain for 150 years.

Please submit the information requested by September 27, 2021. Please address all items noted above by submitting a response to the requested information in hard copy and in electronic format. Please submit the information requested to:

Attn: Nancy Rumrill
Water Division
U.S. EPA Region IX (WTR-4-2)
75 Hawthorne Street
San Francisco, CA 94105
Email: rumrill.nancy@epa.gov

Thank you for your attention to this matter. If you have any questions or wish to discuss further, please contact me at (415) 972-3971, or your staff may contact Nancy Rumrill at (415) 972-3293.

Sincerely,

David Albright
Manager, Groundwater Protection Section

cc: Maribeth Greenslade, ADEQ
Jennifer Saran, FCI